

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

06 DEC -7 PM 12:43
ST. CLAIR COUNTY, MICHIGAN
CLERK OF COURT
OFFICE

UNITED STATES OF AMERICA,

Plaintiff,

v.

KENNETH DEAN VANDENBERG,

Defendant.

No. **1 : 06 CR 0299**
Hon. **Robert Holmes Bell**
Chief, U.S. District Judge
INDICTMENT

The Grand Jury charges:

COUNT ONE

On or about May 16 and 17, 2002, in Kent County, in the Southern Division of the
Western District of Michigan,

KENNETH DEAN VANDENBERG

did knowingly and unlawfully structure a transaction with Huntington Bank, a domestic financial
institution, by conducting at least two of the following transactions:

a. on or about May 16, 2002, one withdrawal of \$9,000 in currency from the Breton
Village branch, and two withdrawals of \$8,000 in currency each from the Kenton branch and the
Fuller branch of said bank;

b. on or about May 17, 2002, five withdrawals of \$9,000, \$8,000, \$6,000, \$6,000
and \$5,000 in currency from the Breton Village branch, the Chateau Office branch, the 44th

Street Office branch, the Remembrance Office branch, and the Alpine Office branch of said bank respectively;

for the purpose of evading the reporting requirements under 31 Code of Federal Regulations, Section 103.22(b).

31 U.S.C. § 5324(a)(3)

31 C.F.R. § 103.22(b)

31 C.F.R. § 103.11(gg)

COUNT TWO

On or about May 22, 2002, in Kent County, in the Southern Division of the Western District of Michigan and elsewhere,

KENNETH DEAN VANDENBERG

did, with the intent to evade a currency reporting requirement under Title 31 United States Code, Section 5316, knowingly and unlawfully conceal more than \$10,000 in United States currency on his person and attempt to transport such currency from a place within the United States to a place outside the United States, that is, from Grand Rapids, Michigan, to the Netherlands.


31 U.S.C. § 5332

31 U.S.C. § 5316

A TRUE BILL


GRAND JURY FOREPERSON

MARGARET M. CHIARA
United States Attorney


RICHARD S. MURRAY
Assistant United States Attorney